

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
TRENTON DIVISION

THE INDEPENDENCE PROJECT, INC., a
New Jersey Non-Profit Corporation, and
RONALD MOORE, Individually,

Plaintiffs,

vs.

Case No.: 3:19-cv-04890-MAS-LHG

FIESTA PLAZA ASSOCIATES, LLC, a
New Jersey Limited Liability Company,

Defendant/Third Party Complainant,

vs.

JIN ZHANG CHEN d/b/a Dragon Chinese
Kitchen, Inc., a New Jersey Corporation;
PETER NGUYEN d/b/a NJ IMAGE NAILS,
LLC, a New Jersey Limited Liability Company,
and KEITH GIAMPAPA d/b/a GIAMPAPA'S
PIZZA,

Third Party Defendants.

STIPULATION FOR DISMISSAL WITH PREJUDICE

Plaintiffs and Defendant, pursuant to the Federal Rules of Civil Procedure, hereby move to dismiss this action with prejudice, a resolution of all matters in dispute having been made pursuant to a Settlement Agreement executed between the parties. The parties have stipulated in their agreement that the Court retain jurisdiction to enforce the terms and conditions of the Settlement Agreement between Plaintiffs and Defendant.

Nothing herein shall affect the lawsuit between Defendant/Third Party Complainant and Third Party Defendants.

Respectfully Submitted,

/s/Alan R. Ackerman

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/s/Arla D. Cahill

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Date: **June 29, 2020**

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Date: **June 29, 2020**